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FILED
DISTRICT COURT OF GUAM

FEB 19 2008

JEANNE G. QUINATA
Clerk of Court

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,	}	CRIMINAL CASE NO. <u>07-00054</u>
Plaintiff,		UNITED STATES APPLICATION TO DISCLOSE CERTAIN TAX INFORMATION
vs.		
JUNG SOO YANG,		
Defendant.		

COMES NOW the United States of America, by and through undersigned counsel, and moves this Honorable Court for an order allowing the government to disclose certain records obtained from the Internal Revenue Service (IRS) and the Guam Department of Revenue and Taxation (Guam Rev/Tax) to defense counsel Jacqueline T. Terlaje. On February 3, 2006, the court issued an Order, Misc. Case No. 06-00001, directing the IRS to disclose to the U.S. Attorney's Office any information it held on Taxpayer Identification Number xxx-xx-7906, among other matters. On March 2, 2006, the court issued an Order, Misc. Case No. 06-00005, directing the Guam Department of Revenue and Taxation to disclose to the U.S. Attorney's Office any information it held on Taxpayer Identification Number xxx-xx-7906.

Defendant Yang was indicted in the above-entitled matter, and made his initial appearance February 4, 2008. He is represented by Jacqueline T. Terlaje. The IRS and Guam

1 Rev/Tax information concerning the TINs referenced in the above-listed orders would be useful
2 to Ms. Terlaje in evaluating the strength of the government's case. The release of such
3 information is allowed by Title 26, United States Code, § 6103(i)(4)(A)(i) as information
4 "probative of a matter in issue relevant in establishing the commission of a crime or the guilt or
5 liability of a party."

6 Respectfully submitted this 19th day of February, 2008.

7 LEONARDO M. RAPADAS
8 United States Attorney
9 Districts of Guam and NMI

10 By: 

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12 Assistant U.S. Attorney
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